

**IN THE WESTERN DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**EVDOKIA NIKOLOVA,  
Plaintiff**

**VS.**

**UNIVERSITY OF TEXAS AT AUSTIN,  
Defendant**

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**CIVIL ACTION**

**NO. 1:19-CV-00877-RP**

**JURY REQUESTED**

**PLAINTIFF’S UNOPPOSED MOTION FOR  
14 DAY EXTENSION OF TIME TO FILE A REPLY REGARDING  
PLAINTIFF’S MOTION FOR REASONABLE FEES AND COSTS**

TO THE HONORABLE ROBERT PITMAN AND SUSAN HIGHTOWER:

Counsel for Plaintiff Evdokia Nikolova, Ph.D., (“Dr. Nikolova” or “Plaintiff”) respectfully files this unopposed request for an additional 14 days to file a Reply to Defendant University of Texas at Austin’s Response to Plaintiff’s Motion For Reasonable Fees and Costs (Dkts. #111 and #116) and shows the Court as follows:

1. Plaintiff filed its Motion for Reasonable Fees and Costs (Dkt. #111) on September 13, 2022. Defendant UT Austin filed its response to Plaintiff’s Motion for Fees (“Dkt. 116”) on October 25, 2022.

2. Under Local Rule CV-7(D), Plaintiff’s reply would be due on November 1, 2022.

3. The Parties have agreed to mediate this case, including attorneys’ fees and front-pay issues, which, if successful, would obviate the necessity of the Court’s ruling on Plaintiff’s Motion for Fees. That mediation is scheduled to take place on November 7, 2022.

4. Additionally, Plaintiff’s counsel Robert McKnight, who has primary responsibility for Plaintiff’s Motion for Fees and reply will be in arbitration the week of October 31-November 4, 2022 and is presently preparing for the arbitration this week.

5. Defendant requested and was granted a 28 day extension of time to file its response to Plaintiff's Motion for Fees. (Dkt. #114).

6. Both Plaintiff's Motion for Fees and Defendant's Response raise issues and that deserve thorough and appropriate briefing. The additional time will allow Plaintiff's counsel time to provide the Court with briefing that will help the Court address and resolve the issues at hand, in the event the mediation of this matter is unsuccessful.

7. This motion is not filed for the purposes of delay but ensure that the briefing filed with the Court is appropriate and to help avoid unnecessary use of resources on the part of the Court and the parties should this matter resolve at mediation. The Parties have worked diligently and in good faith on mutually agreeable post-trial briefing deadlines and a scheduled mediation so as to not unnecessarily delay this matter and to potentially help resolve this case without expending further Court resources.

**PRAYER FOR RELIEF**

WHEREFORE, PREMISES CONSIDERED, Plaintiff's counsel respectfully requests an additional 14 days, until November 15, 2022, to file a Reply to Defendant's Response To Plaintiff's Motion for Fees, and such other and further relief as the Court determines justice and fairness so require.

Respectfully submitted,

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By: /s/ Robert W. Schmidt  
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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with Defendant's counsel Amy Hilton who stated she does not oppose this motion.

/s/ Robert W. Schmidt  
Robert W. Schmidt

**CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2022, this document was served pursuant to Federal Rules of Civil Procedure on counsel for Defendant at the following address:

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/s/ Robert W. Schmidt  
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